IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

M.J.,)
)
Plaintiff,)
)
V.) Cause No. 4:12-CV-00341 JAR
)
WASHINGTON UNIVERSITY)
IN ST. LOUIS PHYSICIANS, et al.)
)
Defendants.)

MOTION OF DEFENDANTS WASHINGTON UNIVERSITY IN ST.
LOUIS PHYSICIANS, WASHINGTON UNIVERSITY SCHOOL OF MEDICINE,
WASHINGTON UNIVERSITY MEDICAL CENTER, MARK
WRIGHTON, LARRY J. SHAPIRO, JAMES P. CRANE, CLAY M.
SEMENKOVICH, MICHAEL A. KASS, NEILL M. WRIGHT, AND
PATRICIA FISHER FOR TIME TO FILE A RESPONSE
TO PLAINTIFF'S SECOND MOTION TO EXTEND THE STAY

Defendants Washington University in St. Louis Physicians, Washington
University School of Medicine, Washington University Medical Center, Mark Wrighton,
Larry J. Shapiro, James P. Crane, Clay M. Semenkovich, Michael A. Kass, Neill M.
Wright, and Patricia Fisher (collectively "University Defendants"), for their motion for time to file a response to plaintiff's second motion to extend the stay, state as follows:

Plaintiff did not serve his motion to extend the stay (filed under seal on
 August 27, 2012) on the University Defendants. University Defendants received a copy

¹ Plaintiff named Washington University in St. Louis Physicians, Washington University School of Medicine, and Washington University Medical Center as defendants, but the properly named entity defendant is "The Washington University."

of the motion from counsel for defendant Barnes-Jewish Hospital, who received a copy from the Court Clerk, in the late afternoon (after 5:00 p.m.) of August 28, 2012.

2. Before this Court rules on plaintiff's second motion to extend the stay,
University Defendants respectfully request time to file a response to the motion up to and
including Friday, August 31, 2012.

WHEREFORE, University Defendants request that they be granted time up to and including August 31, 2012, in which to file their response to plaintiff's second motion to extend the stay, and that the Court grant such other relief as is appropriate in the circumstances.

KOHN, SHANDS, ELBERT, GIANOULAKIS & GILJUM, LLP

/s/ Mark J. Bremer

Mark J. Bremer # 24696MO Kevin Anthony Sullivan # 55140MO 1 North Brentwood Blvd., Suite 800 St. Louis, MO 63105 (314) 241-3963 (314) 241-2509 (fax) mbremer@ksegg.com ksullivan@ksegg.com

Attorneys for defendants Washington University in St. Louis Physicians, Washington University School of Medicine, Washington University Medical Center, Mark Wrighton, Larry J. Shapiro, James P. Crane, Clay M. Semenkovich, Michael A. Kass, Neill M. Wright and Patricia Fisher Case: 4:12-cv-00341-JAR Doc. #: 42 Filed: 08/29/12 Page: 3 of 3 PageID #: 189

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 29th of August, 2012, the foregoing was mailed, postage prepaid, to and filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon M.J., 331 North New Ballas Road, #B-37087, St. Louis, MO 63141, plaintiff pro se; and filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Jonathan H. Garside, Fox Galvin, LLC, One S. Memorial Drive, 12th Floor, St. Louis, MO 63102, attorney for defendant Barnes-Jewish Hospital.

/s/ Mark J. Bremer